

CHICAGO OPERATIONS OFFICE (CH) - ARGONNE AREA OFFICE (AAO) STANDARD
OPERATING PROCEDURE (SOP) 5: **DOE DIRECTIVES DISTRIBUTION AND
IMPLEMENTATION**

A. OBJECTIVE:

Safety oversight of ANL is a primary responsibility for the AAO. This procedure provides policy and guidance for the timely review, dissemination and implementation of draft, new and revised DOE Directives with respect to the Management and Operation contractor (the University of Chicago) or other contracts under the Argonne Area Office's purview and within AAO. This SOP is intended to be used in conjunction with the CH Functions, Responsibilities and Authorities Manual (FRAM) and the AAO Operational Awareness Program Description. These documents constitute the framework for the AAO oversight program.

B. SCOPE:

This procedure applies to AAO personnel at Argonne National Laboratory - East and West.

C. REFERENCES:

1. DOE O 251.1A, Directives System
2. DOE M 251.1-1A, Directives System Manual
3. CH O 251.1, Chicago Operations Office Directives System
4. CH M 251.1-1, CH Directives System Manual
5. CH M 411.1-1B, Functions, Responsibilities and Authorities Manual (CH FRAM)
6. AAO Operational Awareness Program Description
7. Clause I.110 - LAWS, REGULATIONS AND DIRECTIVES of the prime contract (W-31-109-ENG-38)

D.

RESPONSIBILITIES:

1. AREA MANAGER, AAO

- a. Affirms compliance with the prime contract between DOE and ANL, specifically Clause I.110 - LAWS, REGULATIONS AND DIRECTIVES.
- b. Verifies internal procedures are established such that timely review and implementation of Directives are accomplished by AAO and/or the Contractor, as appropriate.

2. CONTRACTING OFFICER (CO)

- a. Makes final determination on comments, scope, implementation, etc., of Directives to be applied by AAO and the Contractor.

3. TEAM LEADER, BUSINESS MANAGEMENT TEAM, AAO

- a. Designates a Directives Coordinator (DC) within AAO.
- b. Verifies AAO's Directives Coordinator develops, implements, and maintains a system for tracking Directives.
- c. Verifies Appendix I, List B - "DOE Directives" of the Prime Contract is updated periodically to reflect current applicable directives.

4. AAO DIRECTIVES COORDINATOR (DC)

- a. Tracks incoming Directives within AAO and to ANL for implementation.
- b. Monitors electronic bulletin boards for notification of draft and final directives.
- c. Notifies designated Team Leader and/or functional lead of proposed new directive or change.
- d. Prepares the directive transmittal correspondence to ANL and coordinates with AAO functional lead.
- e. Updates Appendix I, List B - "DOE Directives" of the Prime Contract as necessary to reflect current applicable directives.

5. TEAM LEADERS, AAO

- a. Requests the appropriate functional lead to review Directive and coordinate AAO/ANL review and/or implementation.
- b. Assures AAO comments regarding contractor comments are provided to Office of Primary Interest (OPI) if deemed necessary.

6. DESIGNATED AAO FUNCTIONAL LEAD

- a. Is advised of ANL comments on draft and final Directives as appropriate.
- b. Verifies compliance action plans are requested and received, as appropriate.
- c. Assesses the adequacy of compliance action plans and makes a recommendation to the AAO Manager and/or CO on implementation of directives including any requested exemptions.
- d. Communicates with CH, AAO, and/or ANL in order to discuss assigned directives and their implications.
- e. Provides procedural and implementation advice to ANL as requested.
- f. Prepares site specific guidance and implementation instructions for ANL when considered necessary.

NOTE: Safeguards and Security Services (TS-SSS) staff may serve as functional lead for Security Directives.

E. PROCEDURES:

1. Distribution of Draft Directives

- a. The CH Directives Point of Contact (DPOC) will electronically transmit notification of draft directives to the ANL and AAO directives point of contact.
- b. The AAO DC will notify AAO functional lead of draft directive on electronic bulletin board.
- c. AAO functional lead discusses assigned directives with ANL as necessary.

- d. AAO functional lead prepares AAO comments and enters them electronically through the RevCom Review and Comment System at <http://www.revcom.doe.gov>.

2. Distribution of Final Directives

- a. AAO DC receives electronic directive notification via CH electronic bulletin boards and by registration through DOE directives "Alerts" at <http://www.directives.doe.gov/alertmain.html> and downloads same.
- b. AAO DC distributes notification of final directive to the appropriate AAO Team Leader and functional lead.
- c. Functional lead coordinates with the DC as to the appropriate distribution of the directive to the contractor in a timely manner, using the format in Attachment 1.
- d. Preparation of the directive implementation transmittal letter for CO signature is the responsibility of the AAO DC.
- e. Functional lead reviews contractor compliance action plan. Follows up on the status of compliance action plans as necessary.
- f. Functional lead develops appropriate procedure/guidance and/or plan for implementation of directive within AAO, as appropriate.

NOTE: Subsequent revisions and additions to directives already implemented will follow the same procedure as above.

SAMPLE LETTER FOR FINAL DIRECTIVE TRANSMITTAL

Dr. Hermann A. Grunder, Director
Argonne National Laboratory
9700 South Cass Avenue
Argonne, Illinois 60439

Dear Dr. Grunder:

SUBJECT: DOE PRIME CONTRACT NO. W-31-109-ENG-38; DOE ORDER ENTITLED, “ “

In accordance with Clause I.110 – LAWS, REGULATIONS AND DIRECTIVES, of the prime contract, the subject final directive is considered to be applicable to this contract, and is transmitted for your implementation in accordance with the prime contract. Please note that other DOE Orders, or portions of Orders may have been canceled by this directive.

Should no exception be taken to the subject directive, that subject directive shall be deemed incorporated into the prime contract within 30 days of receipt of this letter. Appendix I, List B shall be revised periodically.

Please place an “X” in the appropriate response below and return one signed copy for our files. If you have any questions, please contact [*functional lead*] at extension 2- .

Sincerely,

Sergio E. Martinez
Contracting Officer

Enclosure:
As Stated

cc: D. Schmitt, ANL/OPS, 201, w/encl.

bc: *Team Leader*, AAO-W
Functional Lead, AAO-E

LABORATORY RESPONSE

- ☐ The Laboratory is already in compliance.
- ☐ The Laboratory will submit within thirty (30) days (unless otherwise specified) a compliance action plan for immediate implementation of the subject directive which includes:
 - a. Programmatic and operational impact within the Laboratory.
 - b. Additional resources needed to meet full compliance.
 - c. Commitment dates for full and/or partial compliance.
- ☐ The Laboratory believes the Directive is not applicable or should be modified in its application. Rationale to support this conclusion will be provided within 30 days.

Signature: _____

Date: _____

Title: _____

Argonne National Laboratory